

1 Kevin S. Sinclair, NV Bar No. 12277
2 *ksinclair@sinclairbraun.com*
3 SINCLAIR BRAUN LLP
4 16501 Ventura Blvd, Suite 400
5 Encino, California 91436
6 Telephone: (213) 429-6100
7 Facsimile: (213) 429-6101

5 Attorneys for Defendant
NORTH AMERICAN TITLE INSURANCE COMPANY

DESIGNATED LOCAL COUNSEL FOR SERVICE
PER L.R. IA 11-1(b)

8 Gary L. Compton, State Bar No. 1652
9 2950 E. Flamingo Road, Suite L
Las Vegas, Nevada 89121

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

2 DEUTSCHE BANK NATIONAL TRUST
COMPANY,

Case No.: 2:22-cv-00547-GMN-BNW

**STIPULATION AND ORDER FOR
EXTENSION OF TIME TO RESPOND
TO COMPLAINT (ECF No. 1-1)**

SECOND REQUEST

Plaintiff,
4
vs.
5
NORTH AMERICAN TITLE INSURANCE
6 COMPANY.

Defendant.

9 COMES NOW defendant North American Title Insurance Company (“North American”)
10 and plaintiff Deutsche Bank National Trust Company (“Deutsche Bank”), by and through their
11 respective attorneys of record, which hereby agree and stipulate as follows:

2 1. On March 29, 2022, Deutsche Bank filed its complaint in the Eighth Judicial
2 District Court for the State of Nevada;

2. On March 31, 2022, North American removed the instant case to the United States
District Court for the State of Nevada (ECF No. 1);

26 3. On April 28, 2022 the Court granted the parties first stipulation for an extension of
27 time to respond to the complaint, extending North American's response deadline to May 27, 2022
28 (ECF No. 11);

1 4. Counsel for North American requested a 32-day extension, through and including
2 Monday, June 27, 2022, for North American to file its response to Deutsche Bank's complaint to
3 afford North American's counsel additional time to review and respond to the allegations
4 contained in the complaint.

5 5. Counsel for Deutsche Bank does not oppose the requested extension, and agreed to
6 the requested extension on May 26, 2022;

7 6. On that same date, counsel for North American sent Deutsche Bank a proposed
8 stipulation to memorialize the parties' agreement;

9 7. Deutsche Bank's counsel approved the proposed stipulation confirming the parties'
10 agreement on May 30, 2022;

11 8. North American's counsel filed the stipulation on May 31, 2022 (ECF No. 14);

12 9. The Court rejected the proposed stipulation on June 1, 2022 without prejudice
13 (ECF No. 15);

14 10. The parties submit the instant stipulation to both memorialize their agreement
15 extending North American's response deadline and to explain why the prior stipulation (ECF No.
16 14) was not filed until after the May 27, 2022 response deadline had elapsed;

17 11. This is the second request for an extension made by counsel for North American,
18 which is made in good faith and not for the purposes of delay.

19 12. This stipulation is entered into without waiving any of North American's
20 objections under Fed. R. Civ. P. 12.

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1 **IT IS SO STIPULATED** that North American's deadline to respond to the complaint is
2 hereby extended through and including Monday June 27, 2022.

3 Dated: June 1, 2022

SINCLAIR BRAUN LLP

5 By: /s/-Kevin S. Sinclair

6 KEVIN S. SINCLAIR
7 Attorneys for Defendant
NORTH AMERICAN TITLE INSURANCE
COMPANY

8 Dated: June 1, 2022

WRIGHT FINLAY & ZAK, LLP

10 By: /s/-Lindsay D. Dragon

11 LINDSAY D. DRAGON
12 Attorneys for Plaintiff
DEUTSCHE BANK NATIONAL TRUST
COMPANY

13 **IT IS SO ORDERED.**

14 Dated this 2nd day of June, 2022.

15 
16 BRENDAN WEKSLER
17 UNITED STATES MAGISTRATE JUDGE